# TECHNICAL REVIEW DOCUMENT for OPERATING PERMIT 950PMR081 to be issued to:

Public Service Company - Roundup Station Morgan County Source ID 0870030

Prepared on August 4, 1997
Revised on August 18, September 30 and November 20, 1997
Revised on December 26, 1997 as a result of comments
received during the Public Comment Period
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#### I. Purpose:

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered within the Operating Permit proposed for this site. It is designed for reference during review of the proposed permit by the EPA and during Public Comment. The conclusions made in this report are based on information provided in the original application submittal of November 15, 1995, additional technical information submittals of December 14, 1995 and November 19, 1997, comments on the Technical Review Document and draft Operating Permit submitted November 17, 1997 and numerous telephone conversations with the source.

#### **II.** Source Description:

This source is classified as a natural gas production facility as defined under Standard Industrial Classificiation 4925. Roundup Station is a natural gas storage, processing, delivery, and transmission facility. The facility uses three compressor engines for the storage, delivery and transmission of natural gas. The natural gas processing uses a refigerant compressor, two triethylene glycol dehydrators, and one LPG glycol plant. The facility is located in an attainment area for all criteria pollutants. The facility is located just west of Wiggins at the intersection of county roads 3 and I in Morgan county. This facility is not located within 50 miles of any affected state and is not located within 100 km of any Federal Class I designated areas. This facility is a major stationary source with respect to Prevention of Significant Deterioration (PSD) requirements. Future modifications with emissions exceeding significance levels may trigger PSD review. Facility wide emissions are as follows:

<u>Pollutant</u>	Potential to Emit (tpy)	Actuals (tpy)
$NO_x$	258	65
VOĈ	55	15
CO	164	41
HAPS	27	8

Potential to emit is based on information supplied in the Title V application for regulated units. Actual emissions are based on the latest Air Pollution Emission Notice (APEN) submitted with the Title V permit application. The source indicated that this facility is subject to the 112(r) Accidental Release Requirements.

#### **III.** Emission Sources:

- A. Unit E001: Ajax, Model DPC-280, 2-Cycle Internal Combustion Engine (Refrigerant Compressor Engine), Site Rated at 225 HP, Serial No. 77939. Natural Gas Fired.
  - 1. Applicable Requirements This unit was first placed into service and last modified in 1992. The applicable requirements for this engine are identified in Colorado Construction Permit 92MR1345-1 (final approval, modification, 9/12/97). The following terms and conditions of the Construction Permit have been incorporated into the draft Operating Permit:
  - a. Visible emissions shall not exceed 20% opacity (condition 1)
  - b. Emissions of air pollutants shall not exceed the following limitations (condition 3):

NO <sub>x</sub>	5.5 lbs/hr	and	24.1 tons/yr
CO	0.4 lbs/hr	and	1.7 tons/yr
VOC	0.9 lbs/hr	and	3.9 tons/yr

- c. Consumption of natural gas is limited to (condition 4):

  1,752 SCF/hr and 15.35 mmSCF/yr

  Annual records of the actual consumption rate shall be maintained by the source and made available to the Division for inspection upon request.
- **2. Emission Factors -** Emissions from reciprocating engines are produced during the combustion process, and are dependent upon the air to fuel ratio adjustment and specific properties of the natural gas being burned. The pollutants of concern are Nitrogen Oxides ( $NO_x$ ), Carbon Monoxide (CO) and Volatile Organic Compounds (VOC). Small quantities of HAPs are also emitted when combustion is incomplete. Approval of emission factors for these units is necessary as they will be used to demonstrate compliance with the emission

limits. The source is proposing to use emission factors supplied by the manufacturer. The emission factors are as follows:

<u>Pollutant</u>	Emission Factor
$NO_{x}$	11.10 g/hp-hr
CO	0.80 g/hp-hr
VOC	1.80 g/hp-hr

The  $NO_X$  and VOC emission factors proposed by the source exceed the AP-42 emission factors (January 1995) identified in Section 3.2, Table 3.2-2 for 2-cycle lean burn engines. The proposed CO emission factor is less than the AP-42 emission factor.

For the Operating Permit these emission factors proposed by the source were converted to a fuel-based emission factor using the following equation:

EF (lbs/mmBtu) = 
$$[EF (g/HP-hr) \times 1lb/453.6 g \times 10^6 Btu/1 mmBtu]$$
 [design heat rate (Btu/HP-hr)]

**3. Monitoring Plan -** Conditions 1.1 through 1.5 of the Operating Permit list the Monitoring and Recordkeeping provisions necessary to verify compliance with Applicable Requirements for this engine. These methods of verifying compliance are consistent with the requirements identified in the Monitoring Grid for Internal Combustion Engines developed by the Division (see attached). The Grid defines emission calculations and measurement of fuel use as minimum requirements for this engine.

The monitoring grid also requires that semi-annual natural gas analyses be performed to determine the heat content of the gas. During pre-draft review of the Operating Permit, the source submitted data showing that the heat content of the natural gas was consistent at Roundup Station and in PSCo's Northern Zone distribution area. The data showed no significant difference between the gas analyses at Roundup Sation and PSCo's Northern Zone. Therefore, rather than requiring PSCo to perform additional gas analyses at Roundup, the Division will allow PSCo to perform emission calculations using the annual average heat content for the Northern Zone. Records of these analyses are to be maintained and made available to the Divison upon request.

Since the proposed emission factor for CO is less than the AP-42 emission factor, portable monitoring, using a flue gas analyzer for this pollutant is required by the Monitoring Grid. However, since CO emissions for this unit are low (below APEN de minimis) and annual emission fees are not paid on CO, the Division will not require the portable monitoring.

The Division has determined that particulate emissions from internal combustion

engines will be negligible provided pipeline quality natural gas is used as fuel. Compliance with opacity requirements will be based on the exclusive use of pipeline quality natural gas.

- **4. Compliance Status -** The source certified in its Title V permit application that this unit was in compliance with all applicable requirements. A revised APEN was submitted with the Title V application requesting a Transfer of Ownership. The Division agrees that this unit is in compliance with all applicable requirements.
- B. Units E002, E003, & E004: Waukesha, Model L5790GSI, 4-Cycle Internal Combustion Engines (Compressor Engines), Site Rated at 980 HP Each, Serial Nos. 397616, 97617, and 397618, Natural Gas Fired.
  - 1. Applicable Requirements These units were first placed into service and last modified in 1986. Colorado Construction Permit 95MR1037-3 (initial approval) was issued as a result of a Construction Permit application submitted with the Operating Permit application. These units were moved to final approval status based upon the self-certification by the source that these units were fully in compliance with each applicable requirement. This Construction Permit defines the applicable requirements for all three engines. The following terms and conditions of the Construction Permit have been incorporated into the draft Operating Permit:
  - a. Visible emissions shall not exceed 20% opacity (condition 1)
  - b. Emissions of air pollutants shall not exceed the following limitations (condition 3):

 $NO_{\chi}$  53.4 lbs/hr and 234.0 tons/yr CO 37.0 lbs/hr and 162.0 tons/yr VOC 0.7 lbs/hr and 3.0 tons/yr

In order to simplify emission calculations for the Operating Permit, the hourly emission limits in the permit are identified as 17.8 lbs/hr for NO  $_{\times}$  12.3 lbs/hr of CO and 0.23 lbs/hr of VOC. These limits represent hourly emission limits for an <code>individual</code> engine (all engines are identical units). Both the hourly and annual emission limits identified in 95MR1037-3 are for all three engines <code>combined</code>.

c. Consumption of natural gas is limited to (condition 4)
 22,227 SCF/hr and 194.7 mmSCF/yr
 Annual records of the actual consumption rate shall be maintained by the source and made available to the Division for inspection upon request.

In order to simplify emission calculations for the Operating Permit, the hourly fuel consumption limits in the permit are identified as 7,409 SCF/hr.

These limits represent hourly fuel consumption limits for an <u>individual</u> engine (all engines are identical units). Both the hourly and annual fuel consumption limits identified in 95MR1037-3 are for all three engines <u>combined</u>.

**2. Emission Factors -** See Discussion under Unit E001. Approval of emission factors for these units is necessary as they will be used to demonstrate compliance with the emission limits. The source is proposing to use emission factors identified in AP-42 (January 1995), Section 3.2, Table 3.2-2 for 4-cycle rich burn engines. The emission factors are as follows:

<u>Pollutant</u>	Emission Factor
$NO_x$	2.30 lbs/mmBtu
CO	1.60 lbs/mmBtu
VOC	0.03 lbs/mmBtu

**3. Monitoring Plan -** Conditions 2.1 through 2.5 of the Operating Permit list the Monitoring and Recordkeeping provisions necessary to verify compliance with Applicable Requirements for this engine. These methods of verifying compliance are consistent with the requirements identified in the Monitoring Grid for Internal Combustion Engines developed by the Division (see attached). The Grid defines emission calculations and measurement of fuel use minimum requirements for this engine.

The monitoring grid also requires that semi-annual natural gas analyses be performed to determine the heat content of the gas. During pre-draft review of the Operating Permit, the source submitted data showing that the heat content of the natural gas was consistent at Roundup Station and in PSCo's Northern Zone distribution area. The data showed no significant difference between the gas analyses at Roundup Sation and PSCo's Northern Zone. Therefore, rather than requiring PSCo to perform additional gas analyses at Roundup, the Division will allow PSCo to perform emission calculations using the annual average heat content for the Northern Zone. Records of these analyses are to be maintained and made available to the Divison upon request.

The Division has determined that particulate emissions from internal combustion engines will be negligible provided pipeline quality natural gas is used as fuel. Compliance with opacity requirements will be based on the exclusive use of pipeline quality natural gas.

**4. Compliance Status** -The source certified in its Title V permit application that these units were in compliance with all applicable requirements. Revised APENs were submitted with the Title V permit application. Construction Permit 95MR1037-3 was issued as a result of this APEN submittal. The Division concurs that these units are currently in compliance with all applicable

requirements.

- C. Units D001 & D002, J. W. Williams, Triethylene Glycol Dehydrator, Model and Serial Nos. 801-1 & 801-2, Each Unit Rated at 25 mmSCF/day.
  - 1. Applicable Requirements These units were first placed into service and last modified in 1980. Colorado Construction Permit 95MR1037-1 (initial approval) was issued as a result of a Construction Permit application submitted with the Operating Permit application. These units were moved to final approval status based upon the self-certification by the source that these units were fully in compliance with each applicable requirement. This Construction Permit defines the applicable requirements for **both dehydration units**. The following terms and conditions of the Construction Permit have been incorporated into the draft Operating Permit:
  - a. Emissions of air pollutants shall not exceed the following limitations (condition 3):

VOC 6.4 lbs/hr and 28 tons/yr

The Division agreed to provide a monthly short term limit (2.3 tons/mo) for these dehydrators in the Operating Permit because these units represent low emissions and no additional analysis (i.e. modeling) is required. The Operating Permit will require the source to demonstrate compliance with a monthly and annual emission limit for these units.

b. Production rates are limited as follows (condition 4): Natural gas 50 mmSCF/day and 18,250 mmSCF/yr Annual records of the monthly rates of the following shall be maintained by the applicant and made available to the Division for inspection upon request: 1) actual natural gas pipeline throughput and 2) consumption of triethylene glycol.

Because triethylene glycol is not a HAP, the Division will not require the source to maintain records of triethylene glycol consumption.

2. Emission Factors - Emissions from these units will be predicted by the Gas Research Institute's (GRI) GLYCalc Version 2.0 Model or higher. Emissions of VOCs and Hazardous Air Pollutants (HAPs) are dependent on variables input into the model. These variables include glycol recirculation rate, cubic feet of gas processed, moisture content (dew point) of processed gas, and percentage breakdown by weight of constituents in the natural gas. The glycol dehydrator heater is a source of combustion emissions; however, both heaters are rated at 0.40 mmBtu/hr and are therefore considered insignificant activities under Colorado Regulation 3, Part C Section II.E.3.k and these units need not be included in the Operating Permit.

3. Monitoring Plan - Compliance with the emission limits will be demonstrated by recordkeeping and calculation. The source will be required to record monthly natural gas throughput through each unit and calculate emissions using GRI GLYCalc. In addition, based on the attached Glycol Dehydrator monitoring grid, the Division will require the source to keep records of operating parameters (gas throughput, inlet gas pressure, inlet gas temperature and glycol circulation rate) and perform quarterly extended gas analyses. The interval for recording operating parameters is monthly.

In addition, a future MACT standard is being developed for operations at Oil and Gas facilities which may apply to emissions from glycol dehydration units. The source has indicated that they will comply with the requirements of the final MACT rule according to the time lines set forth in the rule.

- **4. Compliance Status -** APENs and contruction permit applications for these units were submitted with the Title V permit application. Construction permit 95MR1037-1 was issued as a result of this submittal. These units are currently in compliance with all applicable requirements.
- D. Unit D003: T. H. Russel, Model V-411, Ethylene Glycol Dehydrator, No Serial Number Available, Rated at 50 mmSCF/day.
  - 1. Applicable Requirements -This unit was first placed into service and last modified in 1992. Colorado Construction Permit 95MR1037-2 (initial approval) was issued as a result of a Construction Permit application submitted with the Operating Permit application. These units were moved to final approval status based upon the self-certification by the source that these units were fully in compliance with each applicable requirement. This Construction Permit defines the applicable requirements for this unit. The following terms and conditions of the Construction Permit have been incorporated into the draft Operating Permit:
  - a. Emissions of air pollutants shall not exceed the following limitations (condition 3):

VOC 3.7 lbs/hr and 16.0 tons/yr

The Division agreed to provide a monthly short term limit (1.3 tons/mo) for this unit in the Operating Permit because this unit has relatively low emissions and no additional analysis (i.e. modeling) is required to convert to a monthly short term limit. The Operating Permit will require the source to demonstrate compliance with a monthly and annual emission limit for this unit.

b. Production rates are limited as follows (condition 4):

 Natural gas 50 mmSCF/day and 18,250 mmSCF/yr

 Annual records of monthly rates of the following shall be maintained by the applicant and made available to the Division for inspection upon

request: 1) actual natural gas throughput and 2) consumption of ethylene glycol.

The Division will only require monitoring of ethylene glycol consumption on an annual basis.

- 2. Emission Factors See discussion under Units D001 and D002.
- 3. Monitoring Plan Compliance with the emission limits will be demonstrated by recordkeeping and calculation. The source will be required to record monthly natural gas throughput through each unit and calculate emissions using GRI GLYCalc. In addition, based on the attached Glycol Dehydrator monitoring grid, the Division will require the source to keep records of operating parameters (gas throughput, inlet gas pressure, inlet gas temperature and glycol circulation rate) and perform quarterly extended gas analyses. The interval for recording operating parameters is monthly. Because this unit uses ethylene glycol, which is a HAP, the source will be required to maintain records of annual ethylene glycol consumption.

In addition, a future MACT standard is being developed for operations at Oil and Gas facilities which may apply to emissions from glycol dehydration units. The source has indicated that they will comply with the requirements of the final MACT rule according to the time lines set forth in the rule.

**4. Compliance Status -** APENs and contruction permit applications for this unit were submitted with the Title V permit application. Construction permit 95MR1037-2 was issued as a result of this submittal. These units are currently in compliance with all applicable requirements.

#### E. Unit F001: Fugitive Emissions of VOC from Equipment Leaks

1. Applicable Requirements - The gas plant at Roundup Station was first placed into service and last modified in 1992. Colorado Construction Permit 92MR1345-2 (final approval, modification 1, 9/12/97) was issued to address these emissions. The following applicable requirements from this construction permit have been incorporated into the Operating Permit: compliance with NSPS Subpart KKK (Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants).

In their response to comments on the Technical Review Document and Draft Operating permit, the source indicated that fugitive VOC emissions from equipment leaks at the Roundup facility were below APEN de minimis levels (2 tpy). Since permit 92MR1345-2 was issued and after the source submitted their Title V permit application, the EPA issued updated emission factors for their "Protocol for Equipment Leak Emission Estimates", EPA-453-R-95-017. These new emission factors are significantly less conservative than the previous

emission factors. PSCo also proposed to use screening range emission factors (also from EPA-453/R-95-017, Table 2-8), for some components at Roundup. The screening range emission factors are based on a actual leak rate (i.e. ≥ 10,000 ppmv or < 10,000 ppmv). Depending on the leak rate these emission factors are either more conservative or less convervative than the average emission factor (EPA-453/R-95-017, Table 2-4). PSCo only used the screening range emission factors for valves and relief valves. As required by NSPS KKK, PSCo is required to monitor these components for leaks, using EPA Method 21 (portable monitor). Using the new average emission factors and screening range emission factors Public Service demonstrated that emissions were below APEN de minimis level. For that reason, the Division removed the emission limits from the Operating Permit and removed the requirement for annual emission calculations.

Specified component counts from the Initial Approval Permit have not been incorporated into the Operating Permit as conditions. A limit on specific components restricts flexibility. As long as the source can demonstrate compliance with the requirements of NSPS KKK no restriction on the specific number of each component is required in the Operating Permit.

- 2. Emission Factors Since this unit has emission below APEN de minimis and are therefore not required to report emissions, the draft Operating Permit will not contain emission calculation requirements in the specific conditions. However, any specific emission unit, as well as the insignificant activities, are subject to the general conditions of the draft Operating Permit which include APEN reporting (Record Keeping and Reporting Requirements Condition 21).
- **3. Monitoring Plan -** Conditions 5.1 through 5.2 list the Monitoring and Recordkeeping provisions necessary to verify compliance with the Applicable Requirements.

The source will be required to submit a report detailing the specific applicable and nonapplicable sections of NSPS KKK to the Division within 6 months of the Operating Permit issue date following the format provided in Appendix G of the draft Operating Permit. Compliance with the reporting requirements of NSPS KKK shall be demonstrated semi-annually.

**4. Compliance Status -** The source certified in their Title V permit application that they were in compliance with all applicable requirements. A revised APEN was submitted with the Title V application requesting a Transfer of Ownership. The Division agrees that this unit is in compliance with all applicable requirements.

#### IV. Insignificant Activities

General categories of insignificant activities include: individual fuel burning (gaseous) equipment less than 5 mmBtu/hr, chemical storage tanks less than 500 gal, landscaping and site housekeeping equipment, crude oil or condensate loading truck equipment, chemical storage areas less than 5,000 gal, storage of butane, propane or LPG in tanks less than 60,000 gal, storage tanks less than 40,000 gal (crude or lube oil and/or condensate), fuel storage and dispensing equipment for company vehicles, storage tanks with throughput less than 400,000 gal/year, fuel burning equipment (gaseous) less than 10 mmBtu/hr for heating, stationary internal combustion engines (emergency generators), and units with emissions less than APEN de minimis. Specific insignificant activities in each of these categories include:

### <u>Units with emissions less than the APEN de minimis - criteria (Reg 3 Part C.II.E.3.a)</u>

Safety Kleen Model 23.0 - Vapor Degreaser Unit Natural gas venting during system blowdowns Evaporation pond for liquids separated from dehydrator and scrubber streams Fugitive particulate emissions from vehicle traffic

## <u>Units with emissions less than the APEN de minimis - non-criteria (Reg 3 Part C.II.E.3.b)</u>

Methanol tank #1 (2,000 gal aboveground)

#### Fuel Burning Equipment less than 5 mmBtu/hr (Reg 3 Part C.II.E.3.k)

Gas heater #1, Par-Mac Custom (2.75 mmBtu/hr)
Gas heater #2, Par-Mac Custom (2.75 mmBtu/hr)
NGL Plant - hot oil boiler, T. H. Russel Co. V-411 (0.40 mmBtu/hr)
TEG Reboiler #1, J. W. Williams 801-1 (0.40 mmBtu/hr)
TEG Reboiler #2, J. W. Williams 801-1 (0.40 mmBtu/hr)
Gas heater for pond three-phase separator (2.0 mmBtu/hr)

### <u>Chemical Storage Areas - capacity not exceeding 5,000 gal (Reg 3 Part C.II.E.3.mm)</u>

NGL Plant - Used ethylene glycol tank (1,000 gal aboveground) Ethylene glycol tank (1,000 gal aboveground) Triethylene glycol tank #1 (295 gal aboveground) Triethylene glycol tank #2 (295 gal aboveground) Triethylene glycol tank #3 (295 gal aboveground) NGL Plant - Ethylene glycol tank (1,000 gal aboveground)

### Storage of butane, propane, or liquified petroleum gas in tank less than 60,000 gal (Reg 3 Part C.II.E.3.zz)

LPG tank (12,000 gal aboveground)
NGL/propane tank (1,000 gal aboveground)

### Storage tanks less than 40,000 gal capacity - lubricating oil (Reg 3 Part C.II.E.3.aaa)

Engine oil tank (500 gal aboveground) Engine oil tank (500 gal aboveground) Waste oil tank (1,500 gal aboveground)

### Fuel storage and dispensing equipment in ozone attainment areas for company vehicles (Reg 3 Part C.II.E.3.ccc)

Unleaded gasoline tank (500 gal aboveground - daily throughput < 400 gal, averaged over a 30-day period)

### <u>Crude oil or condensate storage tanks less than 40,000 gal (Reg 3 Part C.II.E.3.ddd)</u>

Condensate tank - north (5,000 gal aboveground)
Condensate tank - south (10,000 gal aboveground)

# Tanks with annual throughput less than 400,000 gal containing diesel fuel (Reg 3, Part C.II.E.3.fff)

Diesel storage tank (300 gal aboveground)

# <u>Fuel burning equipment less than 10 mmBtu/hr - for heating (Reg 3 Part C.II.E.3.ggg)</u>

Space heating boiler

### <u>Stationary Internal Combustion Engines - Emergency Generators (Reg 3 Part C.II.E.nnn)</u>

Emergency back-up generator (less than 260 hp)

### V. Alternate Operating Scenarios

In a telephone call on March 31, 1997, the source requested that temporary replacement of engines during times of engine overhaul be considered an Alternative Operating Scenario under the existing Operating Permit. The Division has concluded that temporary replacement will be defined as less than a

3 month period. The Division will allow 2 scenarios for temporary engine replacement.

The first scenario is to use an engine with an existing construction permit that has emission limits equal to or below that of the engine to be replaced and has demonstrated compliance with the construction permit limits. The second scenario is to use a grandfathered engine on site, to bring an engine in from out-of-state or to use a newly-purchased engine that does not have a Colorado Construction permit. With this option flue gas analyzer testing is required and the source must be willing to accept a determination of non-compliance should flue gas analyzer testing indicate that the emissions for the engine exceeded those defined in the Operating Permit. Non-compliance will be considered from the day the engine was replaced.

#### VI. Permit Shield

The source identified and justified a short list of nonapplicable requirements that they wish to be specifically shielded from. The nonapplicable requirements that the source will be shielded from are as follows:

- A. Colorado Regulation 6, Part B Section II (Standards of Performance fo New Fuel-Burning Equipment) The permit application states that these requirements are not applicable to this facility because the definition of fuel-burning equipment is "...burning fuel solely for the purpose of producting heat." The permit shield was granted based on the source's justification.
- B. Colorado Regulation 7 (except for Section V, Paragraphs VI.B.1 and 2, and Subsection VII.C) The permit application states that these requirements are not applicable to the facility as the facility is not located in an ozone nonattainment area. Regulation 7 only applies to sources located in ozone nonattainment areas or in the Denver Metro Attainment Maintenance Area with the exception of Section V, Paragraphs VI.B.1 and 2, and Subsection VII.C which are applicable statewide. The permit shield was granted based on the source's justification.
- C. Colorado Regulation 7 (Paragraphs VI.B.1 and 2 and Section VII,C) The permit application did not specify an adequate justification to obtain the shield for these requirements. However, based on the information in the application, the Division has determined that this requirement is not applicable because this facility does not store petroleum liquids in tanks greater than 40,000 gallons and does not store crude oil. The permit shield has been granted for this reason.
- D. Prevention of Significant Deterioration requirements 40 CFR 52.21 (Colorado Regulation 3, Part B, Section IV.D.3) The permit application says that the standard does not apply because no construction or modification of sources exceeding the 250 tpy threshold occurred since Aug. 7, 1977. This is not entirely correct. This source is considered to be a major source in an attainment area

(Potential to Emit > 250 tons/year) and is considered major for the purposes of Prevention of Significant Deterioration (PSD) regulations. Modifications up to this point in time have not triggered significance levels which would bring about PSD review. Future modification to this facility which are in excess of significance levels as defined in Colorado Regulation No. 3, Part A, Section I.B.58 will result in the application of the PSD review requirements. The permit shield was granted based on the preceding justification, information provided in the Title V permit application and the certification of the responsible official.

The source also requested the permit shield for 40 CFR Part 60, Subpart KKK (as adopted by reference in Colorado Regulation 6). The permit application states that NSPS KKK (Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants) only applys to the LPG plant because the rest of the facility was installed and last modified before January 20, 1984. The Title V permit application identifies three engines as having been placed in service in 1986, therefore this justification is not adequate. The Division will be requiring the source to submit a NSPS KKK applicability report within 6 months of permit issuance. This report is the correct forum to identify which NSPS KKK requirements are applicable to this facility and which are not. The permit shield cannot be granted for this requirement.